

**SHUOQIU LIN, ESQ., F0529**  
**DOTTS LAW OFFICE**

Second Floor, DHL Building, Suite 208  
P.O. Box 505979  
Saipan, MP 96950  
Telephone No. (670) 234-1600  
olin@dottslaw.law

*Attorney for Defendant*

**IN THE DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**MD. ASHIQUZZAMAN, MIR FOZLE  
MEHEDI, and MD. SAZEDUL ISLAM,**

**Plaintiffs,**

**vs.**

**MIR CORPORATION,**

**Defendant.**

**CASE NO. 21-00033**

**DEFENDANT'S INITIAL DISCLOSURES  
PURSUANT TO FEDERAL RULES OF  
CIVIL PROCEDURE 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant Mir Corporation ("Mir") through its undersigned counsel, makes the following initial disclosures to the Plaintiffs in the above-referenced lawsuit. These disclosures are based on information presently known and reasonably available to Mir and which is reasonably believed to be supportive of its case. Continuing investigation and discovery may cause Mir to amend these initial disclosures, including by identifying other potential witnesses, documents, and by disclosing other pertinent information. Mir therefore reserves the right to supplement these initial disclosures.

By providing these initial disclosures, Mir does not represent that it is identifying every document, tangible thing, or witness possibly relevant to this action. In addition, these disclosures are made without Mir in any way waiving its right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including

competency, privilege, relevancy and materiality, hearsay, undue burden, confidentiality, or any other appropriate grounds. Furthermore, these disclosures are not an admission by Mir regarding any matter.

Each and every disclosure set forth is subject to the above qualifications and limitations.

**Disclosures Pursuant to Rule 26(a)(1)(A)(i) (Persons with Potentially Discoverable Information):**

The following individuals are likely to have discoverable information regarding this matter:

1. MD ASHAD, Ashiquzzaman's uncle, [Ashadol@gmail.com](mailto:Ashadol@gmail.com); as to Ashiquzzaman's 2<sup>nd</sup>, 7<sup>th</sup> and 8<sup>th</sup> Cause of Action in Plaintiffs' Complaint regarding human trafficking.
2. Munshgand, 8801642046850, as to 2<sup>nd</sup>, 7<sup>th</sup> and 8<sup>th</sup> Cause of Action in Plaintiffs' Complaint regarding human trafficking.
3. Fatama Katum, Mehedi's relative, 01311924173; as to Mehedi's 2<sup>nd</sup>, 7<sup>th</sup> and 8<sup>th</sup> cause of action in Plaintiffs' Complaint regarding human trafficking.
4. Ma Loneta Anellano, Plaintiffs' Co-worker, 670 788-9096; as to 1<sup>st</sup>, 3<sup>rd</sup>, 4<sup>th</sup> 5<sup>th</sup>, and 7<sup>th</sup> Cause of Action in Plaintiffs' Complaint regarding Mir's alleged labor violations.
5. Elsie O Penalta, Plaintiffs' Co-worker, 670 287-4404; as to 1<sup>st</sup>, 3<sup>rd</sup>, 4<sup>th</sup> 5<sup>th</sup>, and 7<sup>th</sup> Cause of Action in Plaintiffs' Complaint regarding Mir's alleged labor violations.
6. Aninda Sarkar, Plaintiffs' Co-worker, 670 287-4455; as to 1<sup>st</sup>, 3<sup>rd</sup>, 4<sup>th</sup> 5<sup>th</sup>, and 7<sup>th</sup> Cause of Action in Plaintiffs' Complaint regarding Mir's alleged labor violations.

The individuals listed above may not constitute a complete listing of all names responsive to the disclosure requirement. Such information shall be forwarded to Plaintiffs when it becomes available.

**Disclosures Pursuant to Rule 26(a)(1)(ii) (Documents, Data and Tangible Things)**

1. Defendant's Production bates stamped 000001-000100 sent to the Plaintiffs on December 8<sup>th</sup> 2021 containing:
  - a. MD. ASHIQUZZAMAN's ("Ashiquzzaman") timesheets and pay records from 2016-2018.
  - b. MIR FOZLE MEHEDI's ("Mehedi") timesheets and pay records from 2016-2017.
  - c. Records of the values of goods that MD. SAZEDUL ISLAM ("Islam") obtained from the Defendant as compensation from 2018-2021.
2. Employment agreement between Mir and Ashiquzzaman signed on February 21, 2016
3. Employment agreement between Mir and Mehedi signed on February 21, 2016
4. Approval Notice regarding Mir Corporation's petition for Ashiquzzaman and Mehedi's CW1 Visas issued on April 29, 2016 and September 19, 2017.
5. Ashiquzzaman's Complaint against Mir filed with the CNMI Department of Labor filed on Feb 5, 2021. (Labor Case No. 21-026)
6. Mehedi's Complaint against Mir filed with the CNMI Department of Labor filed on Feb 5, 2021 (Labor Case No. 21-027)
7. Order to show cause why Ashiquzzaman's labor complaint should not be dismissed by administrative hearing officer, Jacqueline A. Nicolas on Feb 22, 2021
8. Order to show cause why Mehedi's labor complaint should not be dismissed by administrative hearing officer, Jacqueline A. Nicolas on Feb 22, 2021

1 Defendant reserves the right to supplement this disclosure. As additional documents  
2 become available, they will be disclosed either by way of supplemental disclosures or discovery.

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4 **Disclosures Pursuant to Rule 26(a)(1)(A)(iii) (Computation of Damages)**

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6 Defendant does not currently claim any damages in relation to this action.

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8 **Disclosures Pursuant to Rule 26(a)(1)(A)(iv) (Insurance Agreement)**

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10 Defendant does not know of any such applicable document and believes there is no  
11 insurance applicable.

12  
13 Dated this 16th day of December 2021.

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15 DOTT'S LAW OFFICE  
16 *Attorney for Defendant*

17 By: /s/ Shuoqiu Lin  
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